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BY ECF

July 23, 2018

Honorable Richard M. Berman
United States District Court Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Vaughn Richmond*
Docket No.: 13-CR-356

Dear Judge Berman:

I am retained counsel to Vaughn Richmond in the above-referenced case. I write to inform the Court that pursuant to the Court's direction on July 19, 2018, the government and I have been investigating and conferring in anticipation of tomorrow's hearing scheduled for 2:00 p.m.

As part of my investigation into the authenticity of the letters my Firm submitted to the Court on July 18, 2018, and which give rise to tomorrow's hearing, I scheduled an interview today with the author of those letters, Constantine Theodore Anastasakis. My Associate, Chase Ruddy, Esq., interviewed Mr. Anastasakis. Mr. Anastasakis executed an affidavit swearing to the authenticity, truth and accuracy of these letters. We are submitting a copy of the affidavit to the government and also wanted the Court to have a copy in advance of tomorrow's hearing. (See Exhibit A).

During the interview, Mr. Anastasakis also provided documentary evidence further establishing that Malvasia Management Group is a real company, is tied to the business address listed on the company's letterhead, and that the correct telephone number, which Mr. Anastasakis clarifies in his affidavit was a typo on the letterhead, is affiliated with Malvasia. I am attaching those documents to this letter as Exhibits B through E. They include:

- The LLC Operating Agreement for Malvasia Management Group, LLC, signed by Konstantinos Anastasakis on November 14, 2014 (Exhibit B);

- The Articles of Organization for Malvasia Management Group, LLC, filed September 30, 2014 (Exhibit C);
- Bank Statements for Malvasia Management Group, LLC dating from 2015, listing 852 10th Avenue¹, New York, NY 10019 as the business address (Exhibit D); and
- An AT&T Telephone bill for Malvasia Management Group, LLC from 2016 listing the 212 361-9102 telephone number (Exhibit E).

We look forward to addressing the Court tomorrow afternoon, and stand ready to provide the Court with any additional information Your Honor may need.

The Court's consideration is greatly appreciated.

Respectfully submitted,

/s/ Edward V. Sapone
Edward V. Sapone

cc: A.U.S.A. Samson Enzer
A.U.S.A. Brett Kalikow
P.O. Ana Gonzalez

¹ 852 10th Avenue is the same building as 457 W 56th Street. A copy of the New York City Department of Finance Digital Tax Map and Building and Property Information is attached as Exhibit F.